Remarks

It is respectfully requested that claims 1 - 5 be reconsidered for allowance in view of this Amendment and these Remarks.

This amendment is made pursuant to 37 C.F.R. 1.116 and is made to comply with matters of form raised by the Examiner in Office Action dated 1 August 2005, and should therefore be entered.

This amendment is believed to be consistent with what was discussed in a phone interview with the Examiner on 12 Oct. 2005. The preamble of claim 1 is amended to recite that the coupling mechanism includes an upper central implement coupling hook mounted on the cross member, and that the left and right lower implement coupling hooks are positioned lower than the upper central hook. In the body of amended claim 1 the hooks are referred to as "implement coupling hooks" to help distinguish over the Horney reference in which only hooks 42, 50 and 52 are capable of coupling to an implement. I believe that agreement was reached that the structure of Horney between elements 53 and 58 could not be and was not intended to be coupled to an implement.

Claims 1 - 5 were rejected under 35 U.S.C. § 112, second paragraph, as indefinite. Accordingly, claim 1 is amended to recite that the coupling mechanism has left and right lower coupling hooks positioned lower than the upper hook. This supported by all the drawings which show left and right lower coupling hooks 56 and 58 which are positioned lower than the upper hook 29.

Claim 1 is also amended to recite a left attaching member mounted to the left side member and a right attaching member mounted to the right side member.

Claim 1 is also amended to recite that the left attaching member comprises an elongated left body, a first implement coupling hook fixed to a first end of the left body, and a second implement coupling hook fixed to a second end of the left body, the first implement coupling hook having at least one dimensional feature which is larger than a corresponding dimensional feature of the second implement coupling hook, the left attaching member being selectively mountable in the left side member in a first orientation with the first implement coupling hook in an lower operative position and being selectively mountable in the left side member in a second orientation with the second implement coupling hook in an lower operative position.

Amended claim 1 also recites that the right attaching member comprises an elongated right body, a first implement coupling hook fixed to a first end of the right

body, and a second implement coupling hook fixed to a second end of the right body, the first implement coupling hook having at least one dimensional feature which is larger than a corresponding dimensional feature of the second implement coupling hook, the right attaching member being selectively mountable in the right side member in a first orientation with the first implement coupling hook in an lower operative position and being selectively mountable in the right side member in a second orientation with the second implement coupling hook in an lower operative position. This is clearly supported by Figs. 2 and 4. Thus, withdrawal of the 112 rejection is respectfully requested.

Claims 1 - 5 were again rejected under 35 U.S.C. § 102(b) as being anticipated by Horney. This rejection is again respectfully traversed for the following reasons. Amended claim 1 recites left and right attaching members. Each attaching member has an elongated body, and first and second lower hooks are fixed to the ends of each body. As above, this is supported by attaching members 50, side members 14, 16, first lower hook 56 fixed to a first end of the body, and second lower hook 58 fixed to a second end of the body. Thus, each of the two attaching members 50 has two hooks.

Furthermore, Horney clearly shows attaching members 30 and 32. However, member 30 has only a single hook 50 attached to one end thereof, and member 32 has only a single hook 52 attached thereto. Thus, in Horney there is no attaching member with first and second hooks as recited in amended claim 1.

In Horney, left and right legs 30 and 32 are swapped with each other. There is no left attaching member being selectively mountable in the left side member in first and second orientations, as recited in amended claim 1.

The Examiner asserts that member 32 somehow includes a hook comprising ref. number 53 and a member, unnumbered between 53 and 58 of member 32. This is not understood, and appears to be mistaken. A "hook" is defined as a curved or bent device for catch holding or pulling. There clearly is no hook structure between 53 and 58, unnumbered or otherwise. 53 is merely the top end of the outer side wall of leg 32. 58 are aligning pins. Between elements 53 and 58 there is only the upper end of leg 32. This upper end has a C-shaped cross sectional shape. But, this upper end is not shaped like a hook and does not function as a hook. There is no structure between 53 and 58 which could be coupled to an implement. There is no valid reason to consider such structure to be an implement coupling hook recited in

amended claim 1.

Horney shows 3 hooks total - hooks 50, 52 and 42. In contrast, claim 1 recites 5 hooks. This is supported by the drawings which clearly show 5 hooks - two hooks 56, two hooks 58 and a hook 29.

Amended claim 1 also recites left and right side members attached to and extending downwardly from opposite ends of the cross member. This is supported by cross member 12 and side members 14 and 16. The Examiner refers to elements 38 and 40 as "side members". But, 38 and 40 are merely end surfaces of bight 28 (se col. 2, lines 51-53), and therefore they cannot be considered to be "attached to" bight 28, as are the side members 14, 16 as recited in amended claim 1.

Also, claim 1 recites a cross member, left and right side members, and left and right attaching members. This is supported by cross member 12, side members 14 and 16 and two attaching members 50 and 50. This adds up to a total of 5 separate members. In contrast, Horney has only a bight member 28 and left and right legs 30 and 32. This is only three members, not five as recited in amended claim 1. In Horney there is a left leg 30, but there is no left attaching member mounted a left side member as recited in amended claim 1. In Horney there is a right leg 32, but there is no right attaching member mounted to the right side member, as recited in amended claim 1.

Furthermore, in Horney, leg 30 can be attached in only a single orientation with respect to end surface 38 and only in a single orientation on end surface 40. In contrast, claim 1 recites that the left attaching member has two orientations with respect to the single left side member. This is clearly seen by comparing Figs. 1 and 4 where left attaching member 50 can be flipped between 2 orientations with respect to left side member 16.

Thus, it is believed that amended claim 1 should be allowed.

Claims 4 and 5 are amended to be consistent with claim 1 with respect to recitation of "implement coupling hooks" and of the "left" and "right" "attaching members".

Claims 2 - 5 should be allowed because they depend directly or indirectly from allowable claim 1.

In conclusion, it is believed that this application is in condition for allowance, and such allowance is respectfully requested.

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Respectfully,

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